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GRANTED. The Clerk of  
Court is respectfully directed  
to terminate the motion at ECF  
No. 112.

SO ORDERED.



Arun Subramanian, U.S.D.J.  
Date: February 6, 2025

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**LATHAM & WATKINS** LLP  
February 5, 2025

VIA ECF

Hon. Arun Subramanian, United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
Courtroom 15A  
500 Pearl Street  
New York, NY 10007

Re: *Vogel v. TakeOne Network Corp. d/b/a Wrapbook, et al.*, No. 22-cv-03991-AS—  
Consent Letter-Motion Requesting Sealing Protocol

Dear Judge Subramanian:

We represent Defendants TakeOne Network Corp. d/b/a Wrapbook (“Wrapbook”), Ali Javid, Naysawn Naji, Hesham El-Nahhas, and Cameron Woodward (collectively, “Defendants”) in the above-referenced matter. We write on behalf of all parties to respectfully jointly propose a protocol for the sealing and redaction of the parties’ forthcoming summary judgment and *Daubert* motion papers that are due to be filed on February 11, 2025.

Included in the parties’ summary judgment and *Daubert* filings will be exhibits that detail sensitive, non-public information, including proprietary financial data for a Wrapbook (a private company), Wrapbook’s private shareholder information, and other confidential information. The filings will also discuss alleged trade secrets. The parties take seriously their obligations to seek sealing on a narrowly tailored basis, and it would be immensely cumbersome for the parties to complete the meet-and-confer process (as required by the Court’s Rule 11(C)(i) of its Individual Practices in Civil Cases) and finalize proposed redactions in advance of the summary judgment deadline. The parties believe that the meet and confer process will help narrow proposed redactions, and that additional time following the filing deadline would best suit that goal.

The parties thus respectfully request leave for the parties to file summary judgment and *Daubert* filings under seal on February 11, 2025, following up within two weeks with specific requests to redact or seal certain documents pursuant to Rule 11(C)(ii) of the Court’s individual practices. Similarly, the parties request that the same procedure be followed for the relevant opposition and reply papers, with the parties submitting initial filings under seal and following up with narrowly-tailored sealing requests within two weeks.

We thank the Court for its attention to this matter.

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LATHAM & WATKINS<sup>LLP</sup>

Respectfully submitted,

/s/ Steven N. Feldman  
Steven N. Feldman  
of LATHAM & WATKINS LLP

cc: All counsel of record (via ECF)